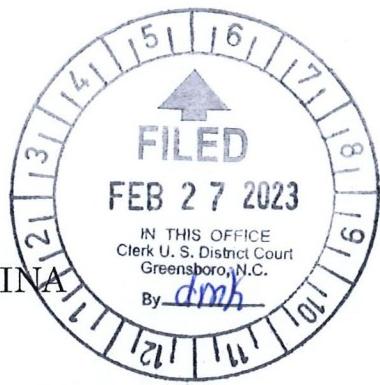


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA : SUPERSEDING
:
v. :
:
ALTON LAMAR BROOKS : 1:23CR9-1
TERYION FREDDEY MARQUIS WILLIAMS : 1:23CR9-2
CAMERON [NMN] PATTERSON : 1:23CR9-3
EBBY DOMINGUEZ-AVILA : 1:23CR9-4
STEVEN CURTIS WILLIAMS, JR. : 1:23CR9-5

The Grand Jury charges:

COUNT ONE

From in or about August 11, 2018, continuing up to and including on or about December 10, 2022, the exact dates to the Grand Jurors unknown, in the County of Forsyth, in the Middle District of North Carolina, and elsewhere, ALTON LAMAR BROOKS, TERYION FREDDEY MARQUIS WILLIAMS, and CAMERON [NMN] PATTERSON, not then being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms; in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D).

COUNT TWO

From on about August 11, 2018, continuing up to and including on or about December 10, 2022, in the County of Forsyth, in the Middle District of

North Carolina, and elsewhere, TERYION FREDDEY MARQUIS WILLIAMS and CAMERON [NMN] PATTERSON did knowingly and willfully conspire to engage in the business of dealing in firearms without being licensed importers, licensed manufacturers, or licensed dealers, and in the course of such business, to ship, transport, and receive one or more firearms in interstate and foreign commerce; in violation of Title 18, United States Code, Section 922(a)(1)(A).

METHODS AND MEANS

1. Between on or about August 11, 2018, and on or about December 10, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired approximately 86 firearms from Winston-Salem area Federal Firearms Licensees (FFLs), including Cash America Pawn, ProShots, Atlas Firearms, Academy Sports + Outdoors, Long's Pawn and Jewelry, and Idol's Gun Rack.

2. Between on or about May 18, 2022, and on or about December 3, 2022, CAMERON [NMN] PATTERSON acquired approximately 82 firearms from Winston-Salem area Federal Firearms Licensees (FFLs), including Atlas Firearms, Academy Sports + Outdoors, Long's Pawn and Jewelry, and Guns & More.

OVERT ACTS

3. On or about February 14, 2020, TERYION FREDDEY MARQUIS WILLIAMS acquired a Glock .45 caliber handgun from Cash America Pawn. 76 days later it was recovered by law enforcement in Spencer, North Carolina.

4. On or about January 19, 2021, TERYION FREDDEY MARQUIS WILLIAMS acquired a Bersa .380 caliber handgun from Long's Pawn and Jewelry. 53 days later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized from an 18-year-old validated gang member.

5. On or about November 16, 2021, TERYION FREDDEY MARQUIS WILLIAMS acquired a Kimber .357 caliber handgun from ProShots. Eight days later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized during a narcotics investigation involving approximately two pounds of methamphetamine.

6. On or about May 27, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto .300 caliber rifle from Long's Pawn and Jewelry. 34 days later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized during a traffic stop involving approximately 66 grams of marihuana.

7. On or about June 29, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto multi-caliber rifle and a Palmetto 5.56 caliber rifle from Long's Pawn and Jewelry. 28 days later the Palmetto multi-caliber rifle was recovered by law enforcement in Winston-Salem, North Carolina, having been seized from a juvenile gang member. 17 days later the Palmetto 5.56 was recovered by law enforcement in Winston-Salem, North Carolina, having been located in a local park where gang members were known to congregate.

8. On or about August 13, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto multi-caliber rifle from Long's Pawn and Jewelry. Eight days later it was recovered by law enforcement in Winston-Salem, North Carolina, found in a hotel parking lot while responding to a "subjects with firearms" call.

9. On or about September 23, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto multi-caliber rifle and a Palmetto 5.56 caliber rifle from Long's Pawn and Jewelry. 32 days later they were recovered by law enforcement in Winston-Salem, North Carolina, having been seized from a felon.

10. On or about September 27, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto multi-caliber rifle from Long's Pawn and

Jewelry. 15 days later it was recovered by law enforcement in Hillsborough, North Carolina, having been seized from a third-party.

11. On or about September 30, 2022, TERYION FREDDEY MARQUIS WILLIAMS acquired a Palmetto multi-caliber rifle from Long's Pawn and Jewelry. 79 days later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized from a third-party.

12. On or about September 30, 2022, CAMERON [NMN] PATTERSON acquired a Glock 9mm handgun from Atlas Firearms. 39 days later it was recovered by law enforcement in High Point, North Carolina, having been seized from a third-party.

13. Between on or about October 17, 2022, and on or about October 25, 2022, CAMERON [NMN] PATTERSON acquired 21 Glock handguns, various calibers, from Long's Pawn and Jewelry. 58 days later 11 of the manufacturer's boxes containing such firearms were recovered by the Greensboro Police Department during the execution of a search warrant at 500 Logan Street, Apartment C, Greensboro, North Carolina.

14. On or about November 4, 2022, TERYION FREDDEY MARQUIS WILLIAMS sold a machinegun equipped with a "Glock Switch" to an undercover ATF agent for \$1,300.

15. On or about November 8, 2022, CAMERON [NMN] PATTERSON acquired a Romarm 7.62 caliber rifle from Long's Pawn and Jewelry. Later that same day TERYION FREDDEY MARQUIS WILLIAMS sold the Romarm 7.62 caliber rifle to an undercover ATF agent for \$1,500. After the sale agents witnessed TERYION FREDDEY MARQUIS WILLIAMS meet with CAMERON [NMN] PATTERSON and provide him an unknown amount of U.S. currency.

16. On or about November 11, 2022, CAMERON [NMN] PATTERSON acquired a Glock 10mm handgun from Long's Pawn and Jewelry. 18 days later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized from an 18-year-old validated gang member.

17. On or about November 12, 2022, CAMERON [NMN] PATTERSON acquired a Taurus .38 caliber handgun from Long's Pawn and Jewelry. One day later it was recovered by law enforcement in Winston-Salem, North Carolina, having been seized from a validated gang member/felon.

18. On or about November 14, 2022, CAMERON [NMN] PATTERSON acquired three Glock 9mm handguns from Long's Pawn and Jewelry. 17 days, 11 days, and 11 days later, respectively, these firearms were recovered by law enforcement outside of the United States, having been seized from third parties.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE

On or about September 21, 2022, in the County of Forsyth, in the Middle District of North Carolina, EBBY DOMINGUEZ-AVILA knowingly and intentionally did unlawfully possess with intent to distribute a quantity of marihuana, a Schedule I controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT FOUR

On or about October 25, 2022, in the County of Forsyth, in the Middle District of North Carolina, STEVEN CURTIS WILLIAMS, JR., knowingly did possess in and affecting commerce firearms and ammunition, that is, a Glock 10mm handgun, a Palmetto State Armory 5.56mm caliber handgun, a Palmetto State Armory .300 caliber handgun, a Kel-Tec 12-gauge shotgun, Winchester 12-gauge ammunition, Starline 10mm ammunition, and Winchester .40 caliber ammunition, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FIVE

On or about October 27, 2022, in the County of Forsyth, in the Middle District of North Carolina, ALTON LAMAR BROOKS knowingly did possess in and affecting commerce a firearm, that is, a Hi-Point .40 caliber handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT SIX

On or about November 4, 2022, in the County of Forsyth, in the Middle District of North Carolina, TERYION FREDDEY MARQUIS WILLIAMS did knowingly and unlawfully possess a machinegun, as defined in Title 18, United States Code, Section 921(a)(24), and Title 26, United States Code, Section 5845(b), that is, a Glock 9mm handgun equipped with a "Glock Switch," enabling it to fire in fully automatic mode; in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT SEVEN

On or about November 8, 2022, in the County of Forsyth, in the Middle District of North Carolina, CAMERON [NMN] PATTERSON, in connection with the acquisition of a firearm, that is, a Century Arms 7.62x39mm pistol, model Mini Draco, serial number 22PG-6396, from a licensed dealer in

firearms, that is, Long's Pawn and Jewelry, 5272 Germanton Road, Winston-Salem, North Carolina, knowingly made a false and fictitious written statement likely to deceive such dealer with respect to facts material to the lawfulness of the sale and other disposition of such firearm, pursuant to Chapter 44, Title 18, United States Code; in that CAMERON [NMN] PATTERSON certified on an ATF Form 4473, Firearms Transaction Record, in response to question 21(a): "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?" to which he provided an answer of "Yes," when in truth and in fact, as CAMERON [NMN] PATTERSON then well knew, he was purchasing the firearm with the intent to later transfer such firearm to another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

On or about November 11, 2022, in the County of Forsyth, in the Middle District of North Carolina, CAMERON [NMN] PATTERSON, in connection with the acquisition of a firearm, that is, a Glock 10mm pistol, model G29SF, serial number BYAK338, from a licensed dealer in firearms, that is, Long's Pawn and Jewelry, 5272 Germanton Road, Winston-Salem, North Carolina, knowingly made a false and fictitious written statement likely to deceive such dealer with respect to facts material to the lawfulness of the sale and other

disposition of such firearm, pursuant to Chapter 44, Title 18, United States Code; in that CAMERON [NMN] PATTERSON certified on an ATF Form 4473, Firearms Transaction Record, in response to question 21(a): “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” to which he provided an answer of “Yes,” when in truth and in fact, as CAMERON [NMN] PATTERSON then well knew, he was purchasing the firearm with the intent to later transfer such firearm to another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

On or about November 14, 2022, in the County of Forsyth, in the Middle District of North Carolina, CAMERON [NMN] PATTERSON, in connection with the acquisition of a firearm, that is, a Glock 9mm pistol, model G26, serial number AGSM879, from a licensed dealer in firearms, that is, Long’s Pawn and Jewelry, 5272 Germanton Road, Winston-Salem, North Carolina, knowingly made a false and fictitious written statement likely to deceive such dealer with respect to facts material to the lawfulness of the sale and other disposition of such firearm, pursuant to Chapter 44, Title 18, United States Code; in that CAMERON [NMN] PATTERSON certified on an ATF Form 4473, Firearms Transaction Record, in response to question 21(a): “Are you the

actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” to which he provided an answer of “Yes,” when in truth and in fact, as CAMERON [NMN] PATTERSON then well knew, he was purchasing the firearm with the intent to later transfer such firearm to another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TEN

On or about November 14, 2022, in the County of Forsyth, in the Middle District of North Carolina, CAMERON [NMN] PATTERSON, in connection with the acquisition of a firearm, that is, a Glock 9mm pistol, model G26, serial number AHAH856, from a licensed dealer in firearms, that is, Long’s Pawn and Jewelry, 5272 Germanton Road, Winston-Salem, North Carolina, knowingly made a false and fictitious written statement likely to deceive such dealer with respect to facts material to the lawfulness of the sale and other disposition of such firearm, pursuant to Chapter 44, Title 18, United States Code; in that CAMERON [NMN] PATTERSON certified on an ATF Form 4473, Firearms Transaction Record, in response to question 21(a): “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” to which he provided an answer of “Yes,” when in truth and in fact, as CAMERON [NMN] PATTERSON then well

knew, he was purchasing the firearm with the intent to later transfer such firearm to another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT ELEVEN

On or about November 14, 2022, in the County of Forsyth, in the Middle District of North Carolina, CAMERON [NMN] PATTERSON, in connection with the acquisition of a firearm, that is, a Glock 9mm pistol, model 26Gen5, serial number AFPH821, from a licensed dealer in firearms, that is, Guns and More, 19 East Main Street, Thomasville, North Carolina, knowingly made a false and fictitious written statement likely to deceive such dealer with respect to facts material to the lawfulness of the sale and other disposition of such firearm, pursuant to Chapter 44, Title 18, United States Code; in that CAMERON [NMN] PATTERSON certified on an ATF Form 4473, Firearms Transaction Record, in response to question 21(a): “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheets (ATF Form 5300.9A)?” to which he provided an answer of “Yes,” when in truth and in fact, as CAMERON [NMN] PATTERSON then well knew, he was purchasing the firearm with the intent to later transfer such firearm to another person; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWELVE

On or about November 9, 2022, in the County of Forsyth, in the Middle District of North Carolina, ALTON LAMAR BROOKS knowingly did possess in and affecting commerce firearms, that is, a Colt .357 caliber handgun and a Harrington and Richardson .32 caliber handgun, handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THIRTEEN

On or about November 14, 2022, in the County of Forsyth, in the Middle District of North Carolina, ALTON LAMAR BROOKS knowingly did possess in and affecting commerce firearms, that is, a Taurus .40 caliber handgun and an SCCY 9mm handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FOURTEEN

On or about November 14, 2022, in the County of Forsyth, in the Middle District of North Carolina, EBBY DOMINGUEZ-AVILA knowingly did possess in and affecting commerce a firearm, that is, a Taurus .38 caliber handgun,

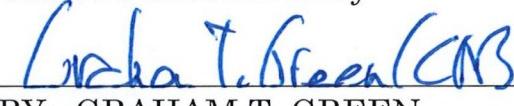
having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FIFTEEN

On or about December 2, 2022, in the County of Forsyth, in the Middle District of North Carolina, ALTON LAMAR BROOKS knowingly did possess in and affecting commerce firearms, that is, an Anderson Manufacturing multi-caliber handgun and a Ceska Zbrojovka Uhersky Brod .45 caliber handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

DATED: February 27, 2023

SANDRA J. HAIRSTON
United States Attorney



BY: GRAHAM T. GREEN
Assistant United States Attorney



BY: CLIFTON T. BARRETT
Assistant United States Attorney

A TRUE BILL:

FOREPERSON